

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION,)	CIVIL NO.04-00502 DAE BMK
a Hawai'i, nonprofit corporation;)	
NA IMI PONO, a Hawai'i)	DECLARATION OF RONALD L. BORNE
unincorporated association; and)	
KIPUKA, a Hawai'i unincorporated)	
association,)	
)	
Plaintiffs,)	
)	
v.)	
)	
ROBERT GATES, Secretary of)	
United States Department of)	Hearing:
Defense; and FRANCIS HARVEY)	
Secretary of the United States)	Date: December 18, 2006
Department of the Army,)	Time: 9:45
)	Judge: Hon. David A. Ezra
Defendants.)	
)	

I, Ronald L. Borne, hereby declare that:

1. I am currently the Director of Transformation, U.S. Army Garrison Hawaii. In this capacity, I oversee the planning, programming, synchronization and management of the facility programs and projects to transform the 25th Infantry Division (25th ID), pursuant to the Army Campaign Plan, into a Modular Force, which includes a Stryker Brigade Combat Team (SBCT).
2. The M781 40 millimeter (mm) Target Practice Training round is fired at the Urban Assault Course from the single shot M203 grenade launcher. It is an all plastic round with a yellow-orange dye similar to a paint ball round. The round uses a blank .38 caliber pistol cartridge for propellant giving it a very low velocity, short range (about 200 meters), and low weight making potential harm to any material very unlikely. The round is used to mark an impact point by rupturing the plastic and spilling the dye marker. As

such, it is extremely unlikely that it would have any impact on potential cultural features in its SDZ.

3. Mr. Quitevis was correct regarding his description of the 40 mm training rounds used at QTR 1. However, I was, and remain, knowledgeable in the make up and ballistic properties of the M918 ammunition and still remain confident that the M918 is not explosive nor is it a UXO, and that damage that it would cause at distance would be minimal to natural surfaces. This is evident from the photo exhibits and descriptions of the MK918 rounds found near suspected cultural sites which show the spent shells laying on the surface and not buried or embedded in other materials. To the best of my knowledge, based on approximately 15 years of experience with range operations in Hawaii, there has been no evidence of 40 mm training rounds having ever damaged a cultural site here in Hawaii and Plaintiffs shown none to date.

4. In my opinion Stryker use of East Range (ER) and Kahuku Training Area (KTA) maneuver areas will not cause irreparable harm to these areas. This is because Stryker units would only be able to use designated "Go" areas, which are mapped and provided accurate coordinates of their location for use in the Stryker vehicle. The fact that Plaintiff's or their escorts were not able to accurately identify the Go.No-go areas during their site visit in no way is reflective of the ability of Soldiers to know exactly where they are, especially with the technology available on Strykers. Commanders will be able monitor Stryker locations and ensure they operate only in the "Go" areas by:

a. The "No Go" terrain is topographically unconducive for off road maneuver due to terrain relief or ground cover. The go areas, on the other hand have been historically driven in by military and civilian vehicles in the past.

b. The Stryker onboard navigation system uses Global Positioning and pre-designated maps which identify and warn of restricted areas. These navigation limitations can be designed to limit travel operations by entering off limits areas and can be updated not only daily but digitally any time the vehicle is in use. Also this system has an embedded warning system to warn drivers and leaders if they are near a pre designated limitation area and will sound an alarm if a limitation is exceeded.

c. The onboard system also broadcasts each vehicle's locations to the lead vehicles so that leaders can maintain accountability ,situational awareness, and monitor subordinate vehicle nearing off limits areas.

5. Regarding Plaintiffs' position that the elimination of permanent vehicle scales at the Multiple Deployment Facility (MDF) would not cause any harm, as explained in earlier testimony, this assertion is incorrect. 2/25 SBCT requires these heavy vehicle scales to deploy and meet deployment timelines. The interim scales established for 3/25 IBCT are not sufficient for 2/25 SBCT and further improvements to the interim facility to meet this requirement would cost as much or more than the \$1,100,000 required to finish the scales at the MDF. When the amount required to provide a permanent functioning deployment facility is compared the overall cost of transformation, it is extremely small and does not preordain a specific course of action. It simply makes good fiscal sense to complete this project instead of wasting the money on a temporary facility that will eventually have to be replaced regardless of where the SBCT is ultimately stationed in Hawaii.

6. Plaintiffs allege that there is no need for the SBCT Motor Pool because even if it is not built we will have sufficient vehicle parking space for vehicles at Schofield Barracks.

This is not correct. What needs to be pointed out is that in January 2008 Schofield Barracks would need to use all of its present permanent motor pools, the new SBCT motorpool, and all the future temporary interim motor pools to fill vehicle parking requirements, and will still have a 3,595 square yard ("sy") shortfall. Attachment One, MP Requirement – Allocation Data, 28 Aug 06, shows all of the temporary interim motor pools that we have yet to create. At the bottom of this page under TOTALS you will see lines for what would then be Permanent Motorpools that equal 578,535 sy and also Temporary/Interim Motorpools that equal 81,917 sy. When these two numbers are added together there is a total of 660,452 sy of motorpool space that will be available at Schofield Barracks. This figure includes the 143,474 sy of parking space that would be provided by the SBCT motor pool. When the incomplete SBCT motorpool and interim motorpools are factored together, it shows a present day shortage of 225,391 sy of required motor pool space at Schofield Barracks. As indicated on the bottom line of attachment 1, an IBCT requires approximately 27,000 sy less space than an SBCT so a shortage of approximately 198,000 sy would exist even if 2/25 were to become an IBCT rather than an SBCT and there would still remain a 81,917 sy permanent motorpool requirement at Schofield Barracks should 2/25 leave completely.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information and belief.



RONALD L. BORNE

15 Dec 06

Date

Allocation Ph2D JAN08 (no CSB)

PHASE 2D - JAN 08

Motorpool - Current Occupant	Facility No.	Org Prkg (SY)			25 CAB	45 SUST BDE	8 TSC	MP BDE	UEy (307)
3/25 IBCT	Bldg 2400	14,133		14,133					
3/25 BCT - 325 BSB	Bldg 2420	13,746		13,746					
3/25 BCT (old 225 BSB)	Bldg 2440	14,278		14,278					
8 SC(T)	Bldg 2460	0	Demolished for MILCON - SBCT Barracks & BOF (-30.008 SY)						
3/25 BCT (old 2/25 SBCT)	Bldg 2480	0							
25 ID STB	Bldg 2510	15,440	15,440						
25 ID STB	Bldg 3030	15,004	15,004						
209 ASB (old DIVARTY)	Bldg 955	28,459		28,459					
25 CAB (old 2/11FA)	Bldg 968	25,604		25,604			0		
524 CSB	Bldg 940	25,770				25,770			
45 SUST BDE (old 1/62 ADA)	Bldg 986	27,491		27,491					
8 TSC (old 3/7 FA)	Bldg 990	13,600		13,600			0		
536 Maint CO	Bldg 1059	24,297		24,297					
45 SUST BDE (old 17 CSB)	Bldg 1080	33,251				0	33,251		
3/25 BCT (old 65 EN)	Bldg 1621	23,010	0	23,010					
2/25 SBCT (old 84 EN)	Bldg 1611	58,419	0				58,419		
2/25 SBCT (old 725)	Bldg 1670		Goes to DOL (-22,700 SY)						
New Complete SBCT MP (SEP 07)	Bldg xxx	143,747		143,747					
Old DOL Shop 6 (DEC 07???)	Bldg xxx	14,752					14,752		
Old CARWELL motorpool	Bldg 2600	22,000							22,000
SUB-TOTAL SB Permanent:		513,001	30,444	143,747	65,167	54,063	91,158	106,422	0
SB - Temp / Interim Motorpools:									
Interim motorpark vic B1052:	Bldg 1052	28,917		28,917					
Interim motorparks vic impound lot:		12,000	12,000				0		
Impound lot:	Impound	10,000		10,000			0		
Interim motorpark extend Shop 6	Shop 6	10,000						10,000	
Bldg 1090 Yard	Bldg 1090	5,000	5,000				0		
SUB-TOTAL SB Temp / Interim:		65,917	17,000	0	38,917	0	0	10,000	0
TOTAL SB:		578,918	47,444	143,747	104,084	54,063	91,158	106,422	10,000
WAAF - Permanent:									
25 CAB	Bldg 1100	41,624		41,624					
SUB-TOTAL WAAF Permanent:		41,624	0	0	0	41,624	0	0	0
WAAF - Temp / Interim:									
Interim motorpark extend Bldg1100 yard	Bldg 1100	10,000		10,000					
SUB-TOTAL WAAF Temp / Interim:		10,000	0	0	0	10,000	0	0	0
TOTAL WAAF:		51,624	0	0	0	51,624	0	0	0
HMR - Permanent:									
MP BDE-HI	Bldg 220	23,910						23,910	0
SUB-TOTAL HMR Permanent:		23,910	0	0	0	0	0	23,910	0
HMR - Temp / Interim:									
Interim motorpark extend Bldg220 yard	Bldg 220	6,000						6,000	
SUB-TOTAL HMR Temp / Interim:		6,000	0	0	0	0	0	6,000	0
TOTAL HMR:		29,910	0	0	0	0	0	29,910	0
TOTALS									
Permanent Motorpools:		578,535	30,444	143,747	65,167	95,687	91,158	106,422	23,910
Temporary / Interim Motorpools:		81,917	17,000	0	38,917	10,000	0	0	16,000
TOTAL Allocation(SB+WAAF+HMR):		660,452				105,687	91,158	106,422	39,910
Required:		664,047	47,864	134,500	107,937	117,020	88,523	113,919	34,384
DELTA (NET avail vs req'd):		(3,595)	(420)	9,247	(3,853)	(11,333)	2,635	(7,497)	5,526
% of Required:		99%	107%	96%	90%	103%	93%	116%	111%